

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MOSAID TECHNOLOGIES INC.,)	
)	
Plaintiff,)	
)	Civil No. 2:23-cv-00129
v.)	
)	JURY TRIAL DEMANDED
MEDIATEK, INC.)	
MEDIATEK USA, INC.,)	
)	
Defendants.)	

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Patent Rule 4-3 of the United States District Court for the Eastern District of Texas and the Court’s Docket Control Order (ECF No. 30), Plaintiff MOSAID Technologies, Inc. (“MOSAID”), and Defendants MediaTek, Inc. and MediaTek USA, Inc. (collectively, “Defendants”) hereby respectfully submit this Joint Claim Construction and Prehearing Statement for the asserted claims of U.S. Patent Nos. 7,051,306 (“the ’306 Patent”), 7,945,885 (“the ’885 Patent”), 7,996,811 (“the ’811 Patent”), 8,253,438 (“the ’438 Patent”), 8,854,077 (“the ’077 Patent”), 9,350,349 (“the ’349 Patent”), and 7,224,563 (“the ’563 Patent”).

I. AGREED CONSTRUCTIONS

Pursuant to Local Patent Rule 4-3(a)(1), MOSAID and Defendants (collectively, the “Parties”) identify the following agreed constructions:

Term	Agreed Construction
“selecting a frequency” (US-306: cl. 1, 16, 37)	Plain and ordinary meaning
“the action including changing a frequency of operation or changing a supply voltage” (US-811: cl. 1, 45)	Plain and ordinary meaning

Term	Agreed Construction
“power manager processor” (US-811: cl. 24, 29)	Plain and ordinary meaning in view of “power manager”
“power manager to control the power consumptions” (US-811: cl. 1, 17, 30, 45, 61)	Plain and ordinary meaning in view of “power manager”
“back biasing” (US-811: cl. 14, 28, 58)	“biasing of the body of a device independently of the source by applying a voltage”
“[determine/determining] a target power level” (US-306: cl. 1, 16, 37)	“[determine/determining] a desired, calculated, or specified power consumption for a power island”
“based on needs and operation of the integrated circuit” (US-306: cl. 1, 16, 37) (US-438: cl. 1, 15)	“based on future operational needs and current operating status of the integrated circuit”
“power consumption signals indicating one or more of the power consumptions” (US-855: cl. 1, 8, 31, 39)	Plain and ordinary meaning
“synchronously” (US-855: cl. 4, 11, 19, 26, 34, 42, 51, 59) (US-811: cl. 30, 61)	Plain and ordinary meaning
“asynchronously” (US-855: cl. 4, 11, 19, 26, 34, 42, 51, 59) (US-811: cl. 30, 61)	Plain and ordinary meaning

II. PROPOSED CONSTRUCTIONS AND INTRINSIC AND EXTRINSIC EVIDENCE

Pursuant to P.R. 4-3(a)(2), the Parties provide their respective proposed constructions or indefiniteness positions for each disputed claim term, phrase, or clause in the table below. Plaintiff's intrinsic and extrinsic evidence for the disputed terms is provided in **Exhibit A**. Defendants' intrinsic and extrinsic evidence for the disputed terms is provided in **Exhibit B**.

Term	MOSAID's Proposed Construction or Position	Defendants' Proposed Construction or Position
<p>"appropriate frequency"</p> <p>(US-563: cl.1, 3, 7, 11, 12, 15, 21–24, 27, 33, 35)</p>	<p>"frequency adapted to be at or below a maximum frequency possible at the delivered voltage"</p>	<p>Indefinite</p>
<p>"power islands"</p> <p>(US-306: cl. 1–7, 10–22, 25–31, 33, 37–43, 46–51)</p> <p>(US-885: cl. 1, 4, 8, 11, 12, 16, 19, 23, 26, 27, 31, 34, 39, 42, 43, 48, 51, 56, 59, 60)</p> <p>(US-811: cl. 1, 8, 9, 13, 15, 17, 19, 20, 22, 24, 26, 27, 30, 32, 33, 37, 43, 45, 52, 53, 59, 61, 63, 73)</p> <p>(US-438: cl. 1–4, 15, 16)</p> <p>(US-077: cl. 1, 2, 8–11, 17, 18)</p> <p>(US-349: cl. 1–5, 10, 11)</p>	<p>"a section of an integrated circuit where power consumption is controlled by independently varying its operating voltage and its frequency of operation"</p>	<p>"a section of an integrated circuit where power consumption is controlled by independently varying its operating voltage or its frequency of operation (or both)"</p>
<p>"power manager"</p> <p>(US-306: cl. 16, 28–33)</p> <p>(US-885: cl. 8, 9, 12, 23, 24, 27, 39, 40, 43, 56, 57, 60)</p> <p>(US-811: cl. 1, 2, 5, 7, 15–19, 22, 23, 30–32, 40, 42–46, 49, 51, 59–62, 70, 72–74)</p> <p>(US-077: cl. 1, 3, 10, 12)</p>	<p>Plain and ordinary meaning, which in the context of the '306, '885, '811, and '077 patents, is "any system, circuitry, or device configured to control power" in accordance with the remainder of the respective claim in which the term appears.</p>	<p>"any system, circuitry, or device configured to control power"</p>

III. LENGTH OF TIME NECESSARY FOR CLAIM CONSTRUCTION HEARING

The Parties believe that two (2) hours are sufficient to present the issues to the Court. The time permitted by the Court should be divided equally between the two sides. MOSAID and Defendants will alternate in their order of presentation on a term-by-term basis. However, if the Court provides a preliminary ruling before the hearing, the non-prevailing party on each term will present its position first.

IV. NO LIVE WITNESSES

At this time, neither Party proposes to call any witnesses, including experts, at the Claim Construction hearing.

V. OTHER ISSUES

A Claim Construction hearing is set for July 30, 2024, at 9:00 am in Marshall, Texas. Pursuant to the Court's Docket Control Order (ECF No. 30), the Parties will submit technical tutorials, if any, as a printed slide deck by June 13, 2024. The Parties do not believe that a live technical tutorial is necessary; however, the Parties can present one before the hearing if the Court prefers.

Dated: May 9, 2024

/s/ Austin C. Teng

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CERTIFICATE OF SERVICE

I hereby certify that, on May 9, 2024, I electronically submitted the foregoing document with the clerk of the United States District Court for the Eastern District of Texas, using the electronic case management CM/ECF system of the Court which will send notification of such filing to all counsel of record who are deemed to have consented to electronic service.

/s/ Austin C. Teng

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